

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JUNIOR GOLDING,

Plaintiff,

-against-

THE CITY OF NEW YORK, P.O. JODY MITCHELL,
Shield No. 22280, Individually and in her Official Capacity
and Police Officers "JOHN DOE" 1-2,
Individually and in their Official Capacities,
the names "JOHN DOE" being fictitious
as the true names are not presently known,

Defendants.

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**PLAINTIFF'S NOTICE OF
MOTION FOR
SANCTIONS AND
ATTORNEY'S FEES**

15-CV-03498 (ALC) (SN)

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law dated August 29, 2016 in Support of Plaintiff's Motion for Attorney's Fees, and the Declaration of Jessica Massimi, Esq. and Exhibits attached thereto and referenced therein, and all of the prior pleadings and proceedings had herein, Plaintiff, Junior Golding, will move this Court, before the Honorable Sarah Netburn, United States Magistrate Judge, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, 10007, on a date and time that is convenient for the Court, for an Order granting Plaintiff's request to award counsel sanctions and attorney's fees in the amount of \$8,137.50, incurred by counsel in (1) opposing Defendants' August 11, 2016 motion for reconsideration; (2) opposing Defendants' August 22, 2016 motion for a stay; and (3) submitting this fee application, for a total of 23.25 hours. Please take notice that all papers in opposition to this motion shall be served on or before September 13, 2016.

Dated: New York, New York
August 29, 2016

Respectfully submitted,

/s/

Jessica Massimi (JM-2920)

To: All counsel of record